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Attorneys for Plaintiff, CHANEL, INC.

THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF CALIFORNIA

CHANEL, INC., a New York corporation,

Plaintiff,

v.

CASONDRA TSHIMANGA a/k/a CASONDRA
SMITH a/k/a CASONDRA SATCHER a/k/a C.
MAYFIELD a/k/a ANNE LLOYD d/b/a
HANDBAGOUTPOST.COM d/b/a
DESIGNEROUTPOST.NET d/b/a
HANDBAGSLUXURY.COM d/b/a BAY
ELECTRONICS and Does 1-10,

Defendants.

Case No. C-07-3592-EMC

**PLAINTIFF'S MOTION FOR
ENLARGEMENT OF TIME TO
PROVIDE SUBSTANTIVE
RESPONSE TO COURT'S SECOND
ORDER FOR SUPPLEMENTAL
BRIEF DATED APRIL 28, 2008**

Pursuant to Civil Local Rule 6-2, Plaintiff Chanel, Inc. ("Chanel"), by and through its undersigned counsel, hereby moves this Court for an Order granting it an enlargement of time within which to provide a substantive response to the Court's Second Order for Supplemental Brief, dated April 28, 2008, and as grounds therefore states as follows:

1. On April 3, 2008, the Court issued an Order requiring Chanel to submit supplemental information regarding Casondra Tshimanga, the websites, HandbagOutpost.com,

1 DesignerOutpost.net and HandbagsLuxery.com, and Kelly Watson in support of its Motion for Final
2 Default Judgment in this matter. On April 17, 2008, Chanel filed its Supplemental Brief.

3 2. On April 28, 2008, this Court entered its Second Order for Supplemental Brief
4 requesting additional information regarding the ownership of the websites HandbagsOutpost.com,
5 DesignerOutpost.net and HandbagsLuxery.com, and requiring Chanel to provide such supplemental
6 information on or before May 12, 2008.

7 3. As outlined in Chanel's Motion for Administrative Relief Pursuant to Local Rule 7-
8 11(a) for Leave to Take Discovery Prior to Rule 26(f) Conference, being filed simultaneously
9 herewith, in order to provide the Court with the additional information requested in its Order, dated
10 April 28, 2008, it will be necessary for Chanel to subpoena records from Network Solutions, LLC
11 regarding ownership and registration of the websites HandbagOutpost.com, DesignerOutpost.net and
12 HandbagsLuxery.com. The ownership and registration information is currently concealed through
13 Network Souolutions' Private Domain registration service.

14 4. Should the Court grant Plaintiff's Motion to conduct early discovery, in order to
15 serve Network Solutions with a subpoena duces tecum and allow Network Solutions sufficient time
16 to compile the requested documents, Chanel requests an enlargement of time of ten days from the
17 date of production by Network Solutions of the requested records within which to file its Second
18 Supplemental Brief in response to the Court's Order, dated April 28, 2008.

19 5. Because the defendant has not appeared in this action, Chanel has not been able to
20 obtain a stipulation as to this motion.

21 WHEREFORE, Plaintiff respectfully requests the Court grant Plaintiff's Motion for
22 Enlargement of Time to Provide a Substantive Response to the Court's Second Order Requesting
23 Supplemental Brief, dated April 28, 2008, and allow Chanel ten days from the date of Network
24 Solutions' production of the documents requested in Chanel's Subpoena within which to file its
25 Second Supplemental Brief. Granting the requested relief will allow the Plaintiff to fully satisfy the
26 Court's request for additional information and evidence regarding the ownership of the three
27 websites at issue in this matter.

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1 Dated: May 12, 2008

KRIEG, KELLER, SLOAN, REILLEY & ROMAN LLP

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3 By: _____/s/_____

4 Kenneth Keller

5 Attorneys for Plaintiff CHANEL, INC.
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